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9 as a Representative Plaintiff, and for the Putative Class

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF ALAMEDA - UNLIMITED JURISDICTION

13 ANDREA O'NEAL-ROBERTS, on behalf of
14 herself, the putative class, and on behalf of the
15 general public,

16 Plaintiff,

17 v.

18 OFF THE GRID SERVICES, LLC, THE
19 WHOLE CART, LLC, and DOES 1-10,
inclusive.

20 Defendants.

) Case No. RG20075270

) Original Complaint filed: Sept. 24, 2020
) Trial Date: None Set

) **ATTIUCS ADMINISTRATION**
) **BACKGROUND AND COST OF**
) **ADMINISTRATION by**
) **DECLARATION OF CHRISTOPER LONGLEY**

) Date: September 6, 2022

) Time: 3:00 p.m.

) Dept.: 23

) Reservation No.: A-20075270-001

ELECTRONICALLY FILED

Superior Court of California,
County of Alameda

07/13/2022 at 03:59:34 PM

By: Darnekia Oliver,
Deputy Clerk

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DECLARATION OF CHRISTOPHER LONGLEY

I, Christopher Longley, declare as follows:

1. I am the co-founder and Chief Executive Officer for Atticus Administration, LLC (“Atticus”). My business address is 1250 Northland Drive, Suite 240, Mendota Heights, Minnesota 55120. My telephone number is (612) 315-9007. I am over twenty-one years of age and am authorized to make this declaration on behalf of Atticus and myself.

2. In 2016, I, along with other experienced legal, financial, digital marketing professionals and brand managers, founded Atticus to provide innovative and cost-effective notice campaigns and claims administration services to the class action legal sector.

3. Prior to founding Atticus, I served as the president of Dahl Administration, LLC, a nationally recognized claims administration company, where I oversaw over three hundred (300) settlements, including some of the highest profile cases over the last few years, including, for example, In Re Motor Fuel (Hot Fuel) and the Target Data Breach, – Financial Institutions class action settlement.

4. Atticus provides services in class action settlements involving, *inter alia*, antitrust, consumer fraud, financial services, insurance, ADA, civil rights, and employment matters, including wage and hour, Private Attorney General Act matters (PAGA) and FLSA collective actions.

5. Atticus’s core competencies include pre-certification mailings, claims administration including the processing of claim forms, claim validation and anti-fraud detection, data preparation and data management, accounting services and tax reporting, qualified settlement fund management and escrow services, and distribution of funds.

6. Since its inception, Atticus has provided administrative services 676 class and collective action settlements and has disbursed approximately \$816,000,000. Among the founders of Atticus, collectively we have administered over 3,000 settlements and have disbursed over \$3,000,000,000 in settlement funds.

7. A true and correct copy of our firm profile is attached hereto as **Exhibit A** for the Courts review.

1 8. Atticus has agreed to a fee to administer the above captioned case, for approximately
2 \$8,204. This fee includes all normal costs to administer a settlement, including mailing, printing, skip
3 tracing and NCOA searches in preparation of mailing the notice packet. All costs associated with
4 communications, including live telephone support, and 800 toll- free call-in number. All costs associated
5 with two distribution of settlement awards, including payment calculations, Qualified Settlement account
6 and account management and QSF tax reporting. Project management time is included in costs, in which
7 we estimate a total of 19 hours of project time for this matter. The fee is fixed and capped at the quoted
8 price, subject to no additional scope changes.

9
10 **I declare under penalty of perjury under the laws of the United States and of the State of**
11 **California that the foregoing is true and correct. Executed on this 27th day of June 2022 in Saint**
12 **Paul, Minnesota.**

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Christopher Longley | CEO
Atticus Administration, LLC

EXHIBIT A



Founded in August 2016, Atticus has administered 673 settlements and has distributed more than \$816 million in award payments. Collectively, the Atticus team has over 125 years of industry experience, has managed over 3,000 settlements, and has distributed more than \$3 billion. Below is a partial listing of our cases, and the cases that our team has managed during their careers.

Partial listing of Atticus' current cases and References

- Birbower v Quorn Foods Inc. -Consumer Food Labeling
- Guillen v AAA Limo-Consumer Finance
- Zamudio v Underground Rocket-CAFA
- Sears Trust-Data Breach
- Noll v Oxford-FLSA
- Kendall v Cubesmart-Data Breach/Consumer
- Moskowitz v Atlanta Hawks-FACTA
- Santos v River Credit Works
- Tirado v Deluxe Auto Sales-Consumer Finance
- Chung v Alliance One-FDCPA
- Raff v Safevia-Consumer Finance
- Diaz v Azona-Wage & Hour
- Rosinbaum v Flowers Foods
- Marroquin v Premium Packaging-FLSA
- Hernandez v So Molo CO-FLSA
- The Bakery v Kenneth Pritt et al-Mass Tort
- Ramirez v Milton Roy-Wage & Hour
- Meyers v bebe Stores-TCPA
- Isabel Marquez v Tanimura & Antle-FLSA
- Camacho v Southwest Harvesting-FLSA
- Velasquez v SMD-Wage & Hour
- Right at Home Settlement-Consumer
- Park v United Collections-FDCPA
- McGlenn v Sprint-FLSA
- Redon v La Esperanza Farms-FLSA
- Home Advisor Settlement
- Morales v OPARC-Wage & Hour
- Loness v US Legal Services-Consumer Fraud
- In Re Managed Care Solutions-Healthcare Anti-Trust
- Kruzell v Suncoast Credit Union-FCRA
- Comofort v Fernandez Brothers-Wage & Hour
- Harris v General Motors-FCRA
- Jillal v Diesel Services-FLSA



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- Padilla v Valadeo-Wage & Hour
- Coyle v Flowers-FLSA
- Espinoza v Alicia Accoyo-Wage & Hour
- Santiago v Northland Group-Insurance
- Viesse v Tacoma Screw-FACTA
- Matthews v Red Hill Country Club
- Tharpe v Sprint Corp
- USI Settlement
- Benefield v Springco Metal Coatings
- Watkins v Pressler Pressler
- Thomas v Goodman Manufacturing
- Bruce v Del Monte Foods
- Best v Twins Towing Inc
- Ahmed v Beverly Hills Rehabilitation Services
- Cook v Window Nation
- Costco-46 State FLSA
- Meyers v Mathis Brothers
- Vela-Cruz v AG Transport
- Ayala et al v Olsen Brothers Ranches
- Big Saver Foods-FACTA Settlement
- Huynh v Parker -Hannifin Corp
- Soto v Vander Tuig Dairy
- Vinnitsky v LA Overnight
- Molando v Dayton Superior
- Party City-FACTA Settlement
- Wesco Aircraft Hardware Corporation Settlement
- Russell v KeHE Distributors
- Exact Staffing Settlement
- Allard v MEd Impact
- Escalata v La Tapatia Mexican Market
- Massarani v Waterman
- Martinez v Providence Farms
- Milo's Chicken Jerky Settlement (Mawbry v Milo's Kitchen-Consumer Protection)
- Wall v Hewlett Packard Industries
- Daisy Castro v Caterpillar Logistics
- Schucker v Flowers Foods International
- Vega v BAR Dairy
- Xcel Health Settlement-Data Breach
- McCurley v Derst Bakery
- Rosenbloom v Jets Pizza
- Marquez v D 'Arrigo Brothers
- Johnson v Thomson Reuters
- Caudle v Sprint Cellular
- Ciaz v ND Travel Nurses
- Sparks v Service Finance Company
- Smentek v Sheriff of Cook County (Civil Rights)



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- Ibanez v OC Burger Boys
 - De La Rosa v Coca Cola
 - Porreca et al v Flowers Baking Company
 - Event Merchandising Settlement
 - Lopez c George Amaral Ranches
 - JKM Trading Settlement
 - Crema v New Jersey National Golf Club
 - Diaz v Arcona Farms
 - Flowers Texas Settlement
 - Miller v Flowers Foods of North Dakota
 - Flowers Global Settlement
 - Ali v Sutter Valley Medical-HIPAA Breach
 - Douillard v Sprint Cellular
 - Patterson v Volkswagen
 - Johnson v Oxnard Automotive Exchange
 - Goh v NCR Corporation
 - Blackburn v APTIM Services
 - SIP ERISA Settlement
 - Rench v HMI-Wage & Hour
 - Matise v Dun & Bradstreet-Wage & Hour
 - Lazy Boy Furniture Galleries Settlement-Wage & Hour
 - Gruma Bakeries FLSA Settlement
 - Flowers Global FLSA Settlement
 - Bennett v Alorcia-PAGA
 - Shachno v Pendry-PAGA/ Wage and Hour
 - Gray v HCI-BIPA
 - Jimenez v The Growers Company
 - Supplemental Income Trust Settlement-ERISA
 - Reyers v Unified Grocers
 - Lyons v Green
 - Manni v Lazy-Boy
 - Carter v Bed Bath & Beyond-Data Breach
 - Wall v Ashbritt
 - Schulte-BIPA Settlement
 - Carrillo v Mabry Management-PAGA/ Wage & Hour
 - Fisher v Behavioral Health Services-PAGA/ Wage & Hour
 - OFCCP v Sprint
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- Boehm v BMW North America
 - Carter v City of Ferguson-(Civil Rights)
 - Gould v Farmers Insurance-TCPA
 - Juarez v Laguna Farms-PAGA
 - Power v Sandbox Logistics
 - Andrews v Prestige Care-PAGA
 - Foster v Advantage Sales
 - Deak v In and Out Burger-PAGA
 - EEOC v Hathaway



- Abdul-Ahad v Associated Courier
- Baudette v McDonough, Dept of Veterans (VA Settlement)
- Bethmann v County of St. Charles (Civil Rights)
- Parrish v Sheriff of Cook County (Civil Rights)
- Whitney v Sheriff of Cook County (Civil Rights)
- Kane v Sheriff of Cook County (Civil Rights)
- Carter v Michigan Department of State Police (Civil Rights)
- Clay v Sheriff of Cook County (Civil Rights)
- In Re Cottonwood Financial (DBA The Cash Store)-Consumer Financial Protection Bureau
- Isley v BMW
- In Re Galileo Learning-CFPB/Bankruptcy
- Bell v Michigan State Police (Civil Rights)
- Hernandez v City of Houston (Civil Rights)
- MacDonald v CashCall
- McNeil v Giles County (Civil Rights)
- Moore v Department of State Hospitals (Civil Rights)
- Noll v Flowers Foods
- Party City FACTA-2
- AMEX-Data Breach
- Piland v Gameface
- Spack v Transworld Entertainment
- The Body Shop FACTA
- Turner v Walmart
- Wallack v AT&T Mobility
- Williams v Equitable Acceptance Corp
- Ybarra v SIP 401k-ERISA Class Action
- Ylvisaker v Clarkson Eyewear-Complex Sales Tax
- Youmans v CPS
- Bootman Settlement
- Zamora v Walgreens-PAGA
- Wakefern Foods-NLRB Settlement
- TPH v BSFC-Medical Records HIPAA Data Breach Disclosure
- Mullins v Data Mgmt-Data Breach
- Caddick & Bertino v Tasty Foods
- USA v Omega Ent
- Williams v Equitable Acceptance Corp-Consumer Fraud, Data Breach
- Nunes v Home Depot
- Cantowine Settlement-Civil Rights
- The Cellular Connection
- Warsame v Michigan State Highway Patrol-Civil Rights
- Signature Consultants-FCRA
- Walgreens-PAGA
- Nucci v Rite Aid
- Hammond -Data Breach
- McShane HIPAA Medical Disclosure Breach
- Hudson v Valley High Hospital-Data Breach



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- Rael v Intercontinental Hotel
- Shopko Settlement-Employee Data Breach
- Body Shop-FACTA
- Rough v Costco
- Baylog v Hashflare
- Medranno v Flowers Foods
- Wilk v Sketchers
- Rowe v Ulta Salon
- Guidry v Dow Chemical-Mass Tort
- Allianz Settlement-Data Breach
- Activision-PAGA
- Shami v Tubby Todd Bath Co-Data Breach



Partial listing of cases the Atticus Team has managed

- Tardiff v. Knox Count
- Nilsen v. York Count
- Tyler v. Suffolk Count
- Braun v. Walmart
- Lundeen v Canadian Pacific Railroad
- Frank v. Gold'n Plump Poultry
- Mass tort Guidant defibrillator
- Cazenave v. Sheriff Charles C. Foti
- Brecher v. St. Croix County
- McCain v. Bloomberg-Data Breach
- Carnegie v Household
- High Sulfur Gasoline Product Liability Shell Oil
- Merrill Lynch Securities Litigation
- Merrill Lynch Data Breach
- Target Data Breach-Financial Institutions
- McKesson HBOC Securities Litigation
- Raytheon Co. Securities Litigation
- Bokusky v. Edina Realty
- Applied Card Bank Credit Card Litigation-Data Breach
- Sun Country Employee Litigation
- Dupont Chemical Pollution Litigation
- Haight v Bluestem Brands, Inc. -TCPA
- Dugan v TGIF-Wage and Hour/FLSA
- Dunkel v Warrior Energy-Energy-Wage & Hour
- Shelby v Miller Investment Group-Consumer Finance
- Salas v Watkins Manufacturing-FLSA
- Dull v IPS-Energy Sector Wage & Hour
- Wallach v FFG-TCPA
- Bourgeoisie v City of Baltimore-Consumer Fees
- Brown v Alley-FLSA
- Turner v ACD-Wage & Hour
- Villa v San Francisco 49'ers-Consumer Fees
- Thomas v Solvay
- Reid v Unilever-Mass-Tort
- Zeller v PDC Corporation-FLSA
- Murr v Capital One-Consumer Fraud
- Redman v City of Chicago- FACTA
- Ernst v Sterling-Dish Case-Consumer Fraud
- Ott-Publix-FLSA
- Ellsworth v US Bank-Consumer Finance
- Vidra v Midland Financial-Consumer Finance
- Vu v Performance Recovery
- Freeman v Berkeley Packaging-FLSA

-CONFIDENTIAL INFORMATION-



- Martin v JTH-TCPA
- Walker v Core Power Yoga-Wage & Hour
- Froberg v Cumberland Packaging-Stevia in the Raw Settlement-False Labeling
- Debarsekin v L2T-FLSA & Wage and Hour
- Gay v Tom's of Maine-False Labeling
- Templeton Rye -False Labeling
- Belardes v Farm Fresh to You-FLSA
- Tin Cup Settlement-False Labeling
- Johnson v ScanSAT-Medical Billing Data Breach
- Garcia v EJ Amusement-FLSA and Wage & Hour
- Doran v Forever Grand Vacations-Consumer Fraud- Time Share
- Velasco v Chrysler Corp-Recall
- Covell v Sleep Train-Wage & Hour
- Torres v Kwon Yet Lung-FACTA
- Redman v IMAX-FACTA
- Target Data Breach-Financial Institutions
- In Re Motor Fuel- Hot Fuel Case- Consumer Fraud
- Haight v Bluestem-TCPA
- Martin v JTH-TCPA
- In Re Target Data Breach-Financial Institutions

Management Team

Chris Longley, JD – CEO and Co-Founder – Former President of Dahl Administration, a nationally recognized Claims Administration Company. Licensed Attorney (Retired Status), admitted to practice Minnesota, 8th Circuit and United States Supreme Court. During Longley's Tenure at Dahl, he successfully managed some of the highest profile cases in the last few years, including *In Re Motor Fuel* (Hot Fuel), an all- digital notice campaign with over 160 mm class members in 36 states and US Territories, and the Target Data Breach- Financial Institutions Settlement.

Bryn Bridley – Director of Project Management – Bryn has over 19 years of Project Management experience within the industry, having worked with two large Settlement Administrators, Rust Consulting and Dahl Administration. Bryn's past claims administration work included the day-to-day activities of several high- profile consumer, employment and other types of cases. Bryn has extensive experience with CAFA Notices and Class Certification campaigns. Bryn is an honor's graduate of the University of Minnesota-Duluth and enjoys running and camping in her free time.

Joel Prest – Director of Technology – Joel has 15 years of experience with software development and project management. Joel has expertise in designing scalable solutions to allow end users to work more efficiently with easy-to-use applications. Joel's prior work history includes



Human Resource Management, which allows him to understand system payroll needs, HIPPA, and tax requirements necessary for employment related cases.

Jim Hardy, CPA (Inactive) – Co-Founder and CFO – Prior to co-founding Atticus, Jim held finance leadership positions over a twenty-year period in a variety of industries (contract manufacturing - implantable medical devices, sheet-fed printing, and commodity trading) where the wide-range of responsibilities and challenges from these experiences has enabled him to develop a versatile set of finance, administrative and operations skills.

Mike Gelhar – Practice Director, Employment & Treasury – Mike brings over 20 years of payroll experience in the employment law practice area. Along with his payroll knowledge, Mike is also bringing his work experience as he managed the processing and distribution of one of the nation's largest Labor and Employment administrators. These cases ranged from a few hundred claimants to over 700,000 claimants in all 50 states, including Puerto Rico.